

1 **CHRISTENSEN JAMES & MARTIN, CHTD.**
 2 Wesley J. Smith (11871)
 3 Kevin B. Archibald (13817)
 4 Dylan J. Lawter (15947)
 5 7440 W. Sahara Avenue
 6 Las Vegas, Nevada 89117
 7 (702) 255-1718
 8 wes@cjmlv.com, kba@cjmlv.com, djl@cjmlv.com
 9 *Attorneys for Plaintiffs Board of Trustees of the*
 10 *Glazing Health and Welfare Trust, et al.*

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 BOARD OF TRUSTEES OF THE GLAZING
 14 HEALTH AND WELFARE TRUST, *et al.*,

15 Plaintiffs,
 16 vs.

17 COMBOS GLASS, INC., *et al.*,

18 Defendants.

19 CASE NO.: 2:23-cv-01837-GMN-BNW

20 **JOINT STATUS REPORT AND
 21 STIPULATION AND ORDER TO
 22 STAY CASE AS TO ALL
 23 DEFENDANTS**

24 **(EIGHTH REQUEST)**

25 The Plaintiffs, Board of Trustees of the Glazing Health and Welfare Trust, *et al.*
 26 (collectively, the “Plaintiffs”), acting by and through their counsel, Christensen James & Martin,
 27 Chtd.; Defendants Combos Glass, Inc. (“Combos Glass”), Genoa Glass, Inc. (“Genoa Glass”), and
 28 Christopher Ronald Combos (“Mr. Combos”) (Combos Glass, Genoa Glass, and Mr. Combos
 collectively, the “Combos Glass Defendants”), acting *pro se*; Defendant Western Surety Company
 (“WSC”), acting by and through its counsel, Anderson, McPharlin & Conners, LLP; Defendant
 SureTec Insurance Company (“SIC”), acting by and through its counsel, The Faux Law Group; and
 Defendants Bathroom & Closet, LLC (“B&C”) and Larry Methvin Installations, Inc. (“LMI”) (B&C
 and LMI collectively, the “LMI Defendants”), acting by and through their counsel, Littler
 Mendelson, P.C. (the Combos Glass Defendants, WSC, SIC, and the LMI Defendants collectively,
 “Defendants”), respectfully submit this Joint Status Report and Stipulation and Order to Stay Case as
 to all Defendants (this “Stipulation”). This Stipulation constitutes the Plaintiffs and Defendants’
 (collectively, the “Parties”) eighth request for such an extension and is being entered in good faith,
 not for any improper purpose, and pursuant to the Stipulation and Order dated April 22, 2025 [ECF
 No. 36]:

1 1. This Case was stayed through June 4, 2025, pursuant to the Stipulation and Order
2 entered by the Court on April 22, 2025 [ECF No. 36].

3 2. The Case was previously stayed to allow the Plaintiffs' auditor to perform a multi-
4 jurisdictional payroll compliance review ("Audit") for the period January 1, 2018 through March 31,
5 2023, and prepare an audit report, and for the Parties to review the audit report and confer regarding
6 the possibility of settlement.

7 3. The Plaintiffs' auditor prepared the Audit Report, and it was distributed to the
8 Defendants on or around January 30, 2025.

9 4. The Plaintiffs, Defendant WSC, Defendant SIC, and the LMI Defendants have
10 reviewed the Audit Report, met and conferred regarding the possibility of settlement on multiple
11 occasions, have proposed at least preliminary settlement offers, and the Parties are continuing such
12 settlement discussions with the intent and belief that negotiations regarding specific terms will lead
13 to settlement and the dismissal of several, if not all, of the Defendants in the near future.

14 5. The Parties agree that this Case should be stayed at least until July 7, 2025, including
15 all applicable responsive pleading due dates, discovery dates, and case deadlines, to allow additional
16 time for the Parties to confer regarding the possibility of settlement and, as applicable, negotiate
17 final settlement terms and documents.

18 6. The Parties will inform the Court as to the potential for early resolution as soon as
19 practicable before the expiration of the stay on July 7, 2025.

20 7. The Parties agree further that the stay discussed herein does not apply to any motions
21 that may be brought by Plaintiffs to compel compliance with this Stipulation.

22 8. If further time is required for early resolution, the Parties will confer to seek an
23 extended stay in this Case.

24 9. The Combos Glass Defendants acknowledge and assert that they have had an
25 opportunity to discuss this Stipulation and the effects that it has or may have with an attorney of their
26 choice, that they accept the consequences of entering into this Stipulation, and that for the limited
27 purpose of entering this Stipulation they have chosen to appear pro se or through their corporate
28 representative. Combos Glass and Genoa Glass understand and acknowledge that they are required

1 to be represented by counsel.

2 **CHRISTENSEN JAMES & MARTIN, CHTD.**

3 By: /s/ Dylan J. Lawter
4 Dylan J. Lawter, Esq. (NV Bar 15947)
5 7440 W. Sahara Avenue
6 Las Vegas, Nevada 89117
7 Tel: (702) 255-1718
8 Email: djl@cjmlv.com
9 *Attorneys for Plaintiffs Glazing Health
and Welfare Trust, et al.*

10 DATED: May 30, 2025.

11 **LITTLER MENDELSON, P.C.**

12 By: /s/ Katy Branson
13 Katy Branson, Esq.
14 8474 Rozita Lee Ave, Suite 200
15 Las Vegas, NV 89133
16 Tel: (702) 862-7730
17 Email: KBranson@littler.com
18 *Attorneys for Defendants Bathroom &
19 Closet, LLC and Larry Methvin
20 Installations, Inc.*

21 DATED: May 30, 2025.

22 **THE FAUX LAW GROUP**

23 By: /s/ Jordan Faux
24 Jordan F. Faux, Esq. (NV Bar 12205)
25 2625 N. Green Valley Pkwy., #100
26 Henderson, NV 89014
27 Tel: (702) 458-5790
28 Email: jfaux@fauxlaw.com
29 *Attorneys for SureTec Insurance Company*

30 DATED: May 30, 2025.

31 **COMBOS GLASS, INC.¹**

32 By: Christopher Combos, its President
33 PO Box 811
34 Genoa, NV 89411
35 Tel: (775) 830-3500
36 Email: chriscombos@gmail.com;
37 combosglass@gmail.com
38 *Pro se*

39 DATED: May __, 2025.

40 **GENOA GLASS, INC.**

41 By: Christopher Combos, its Secretary
42 PO Box 811
43 Genoa, NV 89411
44 Tel: (775) 830-3500
45 Email: chriscombos@gmail.com;
46 combosglass@gmail.com
47 *Pro se*

48 DATED: May __, 2025.

49 **CHRISTOPHER RONALD COMBOS**

50 DATED: May __, 2025.

51 **ANDERSON, MCPHARLIN & CONNERS, LLP**

52 By: /s/ Vincent James John Romeo
53 Vincent James John Romeo (NV Bar 9670)
54 601 S. Seventh St.
55 Las Vegas, NV 89101
56 Tel: (702) 479-1010
57 Email: vjjr@amclaw.com
58 *Attorneys for Western Surety Company*

59 DATED: May 30, 2025.

60

¹ The Defendants listed herein without signatures did not respond to Plaintiffs' request for authorization/signature prior
61 to filing.

ORDER

For the reasons stated above, and for good cause, it is hereby ordered that:

1. This Case and all responsive pleading, discovery dates, and deadlines are stayed until July 7, 2025, to allow the Parties to review the Audit Report and confer regarding the possibility of settlement.

2. The Parties shall submit a Joint Status Report by July 7, 2025, advising the Court whether the Parties will seek an extension of the discovery stay or whether the discovery stay may conclude.

IT IS SO ORDERED.

Shawkey
UNITED STATES MAGISTRATE JUDGE

DATED: 6/4/2025

CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On the date of filing of the foregoing papers with the Clerk of Court, I caused a true and correct copy to be served in the following manner:

ELECTRONIC SERVICE: Pursuant to Local Rule LR IC 4-1 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address:

OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight delivery via a nationally-recognized courier, addressed to the parties listed below at their last-known mailing address:

ELECTRONIC MAIL: By emailing a true and correct copy of the above-referenced document to the parties listed below which was incorporated by reference and made final in the w at their last-known mailing address:

Combos Glass, Inc., Genoa Glass Inc. and
Christopher Combos
chriscombos@gmail.com
combosglass@gmail.com

FAXSIMILE: By sending the above-referenced document via facsimile to those persons listed on the attached service list at the facsimile numbers set forth thereon.

CHRISTENSEN JAMES & MARTIN, CHTD.

By: /s/ *Natalie Saville*